

FILED

OCT 14 2016

JULIE RICHARDS JOHNSTON, CLERK
US DISTRICT COURT, EDNC
BY 88 DEP CLK

i, verify, all herein be true...
'federal district court'

OF THE UNITED STATES FOR EASTERN, NORTH CAROLINA

i, woman: Joyce Loney

claimant, private prosecutor

Nature of case: claim

Claim: tort trespass, TCPA violations
civil right violation,
causing harm and injury
(verified)

a, man: Steve Navo, CEO
and Bluestem Brands, INC
Respondent, wrongdoer

7:16-cv-286-FL

"trial by jury"

i, require: court of record: magistrate

Claim: tort trespass, TCPA violations, civil right violation, causing harm and injury

U.S. Const. Art. VI, cl. 3.

25 C.J. §§ 344; 346;

2. Danv. 256

The bill of rights of the united States Constitution

3 BL. Comm. 378; Articles: VII; IX;

The North Carolina Constitution

Notice

The Loney Court delivers notice:

i, an aggrieved woman, claim wrongdoers trespass by way of violating the Telephone Consumer Protection Act ("TCPA"), 47 U.S.C. § 227, et seq., by contacting Claimant through autodialed and/or pre-recorded calls on her cellular telephone regarding a Bank of America debt collection account, the calls continued after Claimant withdrew her permission for Bluestem Brands, Inc to call her, at issue all calls were non- emergency, debt collection calls, other than their own without prior express consent to receive such calls between February 1, 2014 and July 25, 2016 these

contacts deprived claimant of her civil rights. Causing tort trespass, TCPA violations, harm and injury.

Wrongdoers had a campaign of harassment by telephone in an effort to collect on the missed payments. Wrongdoers through its subsidiaries and agents, employs thousand of persons at call centers throughout the country. These calling centers use automatic telephone dialing systems and computerized account information to track, record and maintain the millions of consumer debts serviced by the wrongdoers.

Wrongdoers acted willfully or knowingly or both in calling numbers using an autodialer without regard to the TCPA or whether the number was assigned to a cellular telephone

i, an aggrieved woman in all of my "good faith" efforts, wishes and demands to settle the matters of controversy on the private side, have been met by way of silence,

i, now present and move my case in this venue, to have my suit tried before by a jury, for the judges (the jury) to render its verdict based upon the merits of my case.

i, require compensation for the initial and continued trespass upon my rights; \$500 for the first call and \$1,500 for each additional call, 30 plus calls were placed to me after cease and desist letters of notification was delivered, and compensation of \$100 per day from first telephone call until date settled. Payable, due forthwith and is to be paid in full within 21 days after wrongdoers have been served this claim, to prevent further damages from accruing;

I, say here and will verify in open court that all herein be true.

Respectfully submitted this 25 day of Jul, 2016.

I am, without prejudice UCC 1-308

By: *Joyce Loney* agent

by: Joyce Loney, agent

4956 Long Beach Road, SE

STE 14, PMB 362

Southport, NC 28461

VOID WHERE PROHIBITED BY LAW